

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JANICE PIERRE

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CRIMINAL NO.: 05-M-0471-RBC

JOINT MOTION FOR TO EXCLUDE TIME

The United States, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant United States Attorney Seth P. Berman, and the defendant, by and through her attorney James Krasnoo, Esq., jointly move pursuant to 18 U.S.C. §3161 (h)(8)(A), to exclude the period of time commencing on September 12, 2005 and ending on November 30, 2005 from the period in which an indictment must be filed pursuant to 18 U.S.C. §3161(b). As grounds therefore, the parties state that the parties need this additional time to discuss issues relating to the case, which could impact the government's charging decisions in this matter.

WHEREFORE, the parties respectfully request, under 18 U.S.C. §3161(h)(8)(A) and §5(c)(1)(A) of Plan for Prompt Disposition of Criminal Cases of this Court, that this Court find, based on the above, that the ends of justice served by granting the exclusion outweigh the best interest of the public and the defendant in a speedy indictment, and, accordingly, exclude the above period in computing the time within which an indictment must be filed under 18 U.S.C. §3161.

Respectfully Submitted,

JANICE PIERRE
By her attorney

/s/James Krasnoo
JAMES KRASNOO, ESQ.
978-475-9955

MICHAEL J. SULLIVAN
United States Attorney
By:

/s/ Seth P. Berman
SETH P. BERMAN
Assistant U.S. Attorney
(617) 748-3385

September 29, 2005